

SILLS CUMMIS & GROSS P.C.

Jeffrey J. Greenbaum

Katherine M. Lieb

One Riverfront Plaza

Newark, New Jersey 07102

(973) 643-7000

PATTERSON BELKNAP WEBB & TYLER LLP

Adeel A. Mangi

Harry Sandick (admitted *pro hac vice*)

George LoBiondo

1133 Avenue of the Americas

New York, New York 10036

(212) 336-2000

*Attorneys for Plaintiff**Johnson & Johnson Health Care Systems Inc.***UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY****JOHNSON & JOHNSON****HEALTH CARE SYSTEMS INC.,**

Plaintiff,

v.

**SAVE ON SP, LLC, EXPRESS
SCRIPTS, INC., AND ACCREDO
HEALTH GROUP, INC.,**

Defendants.

:

Civil Action No. 22-2632(JKS)(CLW)

:

Hon. Jamel K. Semper, U.S.D.J.

:

Hon. Cathy L. Waldor, U.S.M.J.

Hon. Freda L. Wolfson, Special Master

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NOTICE OF MOTION TO SEAL

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COUNSEL:

PLEASE TAKE NOTICE that on November 4, 2024 at 9:00 a.m., or as soon thereafter as counsel may be heard, the undersigned attorneys for plaintiff Johnson

& Johnson Health Care Systems Inc. (“JJHCS”) will apply before the Honorable Freda L. Wolfson, Special Master at the United States District Court for the District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101, for an Order:

- (a) Permanently maintaining under seal the letters and supporting exhibits filed by the parties in connection with defendant Save On SP, LLC’s Motion to Compel JJHCS to search for and produce documents regarding the meaning of the May-Not-Use Provision, dated August 23, 2024 (the “May-Not-Use Motion”), with related briefing on September 10 and September 19, 2024 (ECF Nos. 355, 377 & 387, filed August 27, September 10, and September 20); and
- (b) Permitting JJHCS to file the proposed public versions of ECF Nos. 355, 377 & 387, attached as Exhibits A, B, and C to the Declaration of Jeffrey J. Greenbaum submitted in support of this motion (“Greenbaum Declaration”).

PLEASE TAKE FURTHER NOTICE that in support of this motion, JJHCS will rely on the accompanying Greenbaum Declaration and the index in support of this motion. A proposed form of Order is also attached.

PLEASE TAKE FURTHER NOTICE that pursuant to L. Civ. R. 7.1(d)(4), no brief is necessary inasmuch as the application presents issues that are a matter of familiarity to the Court.

Respectfully submitted,

SILLS CUMMIS & GROSS P.C.
One Riverfront Plaza
Newark, New Jersey 07102
(973) 643-7000

By: s/ Jeffrey J. Greenbaum
JEFFREY J. GREENBAUM
KATHERINE M. LIEB

PATTERSON BELKNAP
WEBB & TYLER LLP
Adeel A. Mangi
Harry Sandick (admitted *pro hac vice*)
George LoBiondo
1133 Avenue of the Americas
New York, New York 10036
(212) 336-2000

*Attorneys for Plaintiff Johnson & Johnson
Health Care Systems Inc.*

Dated: October 8, 2024